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GABRIEL P. HARVIS
BAREE N. FETT

February 12, 2018

BY ECF

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

SO ORDERED:

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

2/19/18

Re: *Lisa Snead v. City of New York, et al.*, 16 CV 9528 (AJN)

Your Honor:

I represent plaintiff Lisa Snead in the above-referenced civil rights action. I write to respectfully request an extension of plaintiff's deadline to reply to defendants' opposition to plaintiff's motion for partial summary judgment and oppose defendants' motion for partial summary judgment until March 19, 2018. Defendants take no position on the application.

At the conference in this matter held on December 15, 2017, the Court set a deadline of February 15, 2018 for the filing of dispositive motions. Plaintiff filed her motion for partial summary judgment on January 22, 2018. DE #64. Pursuant to § 3(G)(viii) of the Court's Individual Rules and the schedule set at the December 15th conference, defendants' opposition and any affirmative motions were due by February 5, 2018. Defendants filed their opposition on February 5th. DE #69. Two days later, defendants filed a letter seeking leave to file an affirmative motion. DE #72. Two minutes after that, defendants filed their motion. DE #73. If it should please the Court, plaintiff's reply is thus due today.

However, plaintiff's counsel is actively preparing for a trial commencing before the Hon. Jack B. Weinstein on February 20, 2018 in the matter of *Cordero v. City of New York*, 15 CV 3436 (JBW) (CLP). The first phase of the bifurcated trial is expected to conclude that week. On March 5, 2018, plaintiff's counsel is commencing trial before

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the Hon. Colleen McMahon in *Harris v. City of New York*, 15 CV 8456 (CM). The *Harris* trial is expected to last several days. Phase II of the *Cordero* trial has not yet been scheduled.

Given the aforementioned professional commitments, the undersigned respectfully requests additional time to complete the remaining portion of plaintiff's briefs in the instant action. The undersigned would like to give the issues raised in this case his complete attention.

Accordingly, plaintiff respectfully requests that her deadline to reply to defendants' opposition to her partial motion and oppose defendants' partial motion be extended until March 19, 2018.

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: Nana Sarpong, Esq.